

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

|  |   |                             |
|--|---|-----------------------------|
| BRYAN SAMS,                              | ) |                             |
|  | ) |                             |
| Plaintiff,                               | ) |                             |
|  | ) |                             |
| vs.                                      | ) | Case No. 24-cv-00602-CVE-SH |
|  | ) |                             |
| JOHNSON MATTHEY INC., d/b/a              | ) | Removed from Tulsa County   |
| TRACERCO, a foreign corporation,         | ) | Case No. CJ-2024-4271       |
| THE UNIVERSITY OF TULSA, a not-for-      | ) |                             |
| profit Oklahoma Corporation,             | ) |                             |
| CHEVRON USA, INC., a foreign corporation | ) |                             |
| CHASE ENVIRONMENTAL GROUP, INC.          | ) |                             |
| a foreign corporation,                   | ) |                             |
| CHINA INSTITUTE OF ATOMIC ENERGY         | ) |                             |
| a foreign corporation,                   | ) |                             |
|  | ) |                             |
| Defendants.                              | ) |                             |

**UNOPPOSED/AGREED THIRD MOTION FOR EXTENSION OF TIME TO SUBMIT  
DISMISSAL PAPERS PRIOR TO CASE CLOSURE**

COMES NOW, JOHNSON MATTHEY INC., d/b/a TRACERCO (“Tracerco”) and hereby requests a third extension of the administrative closing deadline and date to submit the Joint Motion to Dismiss with Prejudice with its accompanying Agreed Order of Dismissal with Prejudice (“dismissal papers”) to July 18, 2025. In support thereof, Tracerco states as follows:

1. As the Court is aware, the parties have reached a settlement [see Doc. 42] and are diligently finalizing the written settlement documents and dismissal papers. Per Doc. 43, the parties are to file the dismissal papers by May 30, 2025.

2. Despite their diligence, the parties needed an additional fourteen (14) days, or until June 13, 2025, to finalize these tasks and file the dismissal papers which was granted [See Doc.

45]. For the same reason, the Parties requested another extension until June 26, 2025, that the Court granted [Doc. 47].

3. Unfortunately, due to schedules and unavailability, the parties have not completed the settlement documentation. Plaintiff's counsel has been out of the country and returned this week.

4. After conferencing it was determined the additional time will be needed to complete the documentation of the agreement. It is believed that all other aspects of the settlement process should be completed within 21 days or July 18, 2025.

5. This motion is unopposed and/or agreed to by all parties. No party will be prejudiced by the request.

6. This request is sought in good faith and not for the purpose of delay. As the case has settled and is administratively closed, there is no active schedule or trial setting; thus, granting this motion will not affect any deadlines.

7. A proposed order is being submitted simultaneously to the Court for consideration under LCvR7-1(g).

WHEREFORE, Defendant Tracerco, on behalf of all parties, respectfully requests that the Court issue an Order extending the deadline for the parties to file the dismissal papers to July 18, 2025.

Respectfully submitted this 27th day of June 2025.

**DOERNER, SAUNDERS, DANIEL  
& ANDERSON, L.L.P.**

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*Attorneys for Johnson Matthey Inc.,  
d/b/a Tracerco*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2025, I electronically transmitted the foregoing document to the Court Clerk using the ECF System for filing. The Court Clerk will transmit a Notice of Electronic Filing to the ECF registrants.

s/Michael S. Linscott